

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

FAIRHOLME FUNDS, INC., et al.,)	
)	
Plaintiffs,)	
)	
v.)	No. 13-465C
)	(Judge Sweeney)
THE UNITED STATES,)	
)	
Defendant.)	

JOINT MOTION FOR SCHEDULING ORDER REGARDING BRIEFING OF SEALED MOTION OF ARNETIA JOYCE ROBINSON TO REMOVE THE “PROTECTED INFORMATION” DESIGNATION FROM CERTAIN DISCOVERY MATERIALS

Defendant, the United States, and Arnetia Joyce Robinson (collectively, the movants) respectfully submit this motion for a scheduling order regarding briefing of the sealed motion (ECF No. 321) filed by Ms. Robinson requesting that the Court order the removal of the “Protected Information” designation from certain discovery materials the United States and other parties have produced in this case. Ms. Robinson is the plaintiff in *Robinson v. Federal Housing Finance Agency, et al.*, Case No. 7:15-cv-109 (E.D. Ky.). Counsel for Ms. Robinson was previously granted access to protected information in this case by Order of this Court dated December 18, 2015 (ECF No. 279).

Counsel for the United States has conferred with counsel for Ms. Robinson in an attempt to resolve Ms. Robinson’s motion by mutual agreement of the movants, as permitted by paragraph 15 of this Court’s Second Amended Protective Order, dated November 9, 2015 (ECF No. 256). In the event that the movants are unable to resolve Ms. Robinson’s motion without further action by the Court, however, the movants jointly request that the Court order that the following briefing schedule apply to Ms. Robinson’s motion:

1. No later than Monday, May 16, 2016, the entities that produced the documents from which Ms. Robinson seeks to remove the protected designations¹ will advise Ms. Robinson of any documents for which the producing entity is willing to remove such designation.
2. In the event that the producing entities are unable to reach agreement regarding the removal of the protected information from the documents identified by Ms. Robinson, the United States, and, if necessary, other producing parties, will file any response(s) to Ms. Robinson's motion no later than Thursday, May 19, 2016.
3. Ms. Robinson will file any reply in support of her motion no later than Friday, May 20, 2016.

Counsel for plaintiffs, Fairholme Funds, Inc., et al. (Fairholme), advised counsel for movants that Fairholme does not oppose the proposed scheduling order.

¹ The other entities, in addition to the United States, are the Federal Housing Finance Agency, the Federal National Mortgage Association (Fannie Mae), the Federal Home Loan Mortgage Corporation (Freddie Mac), Grant Thornton LLP, PricewaterhouseCoopers, and Deloitte.

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Dated: May 11, 2016